



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

186896



ACTION MEMORANDUM

DATE: JUN 28 2004

SUBJECT: Request for Change in Scope, Ceiling Increase and 12-Month Exemption for a Removal Action at the Cornell Dubilier Electronics Site, South Plainfield, Middlesex County, New Jersey.

FROM: Thomas P. Budroe, On-Scene Coordinator *Thomas P. Budroe*
Removal Action Branch

TO: George Pavlou, Director
Emergency and Remedial Response Division

THRU: *Richard C. Salkie*
Richard C. Salkie, Chief
Removal Action Branch

Site ID #: GZ

JUL 15 2004
RECEIVED

I. PURPOSE

The purpose of this Action Memorandum is to request a change in scope, a ceiling increase and 12-month exemption for the removal action described herein for the Cornell-Dubilier Electronics Site (Site), located in South Plainfield, Middlesex County, New Jersey, 07080.

The proposed action involves the removal and disposal of contaminated soil from the residential property located at 126 Spicer Avenue in South Plainfield and restoration of the property to conditions similar to those prior to the removal action. The estimated cost for this work is \$203,118, of which \$148,121 is for mitigation contracting. The new mitigation contracting ceiling will be \$394,622 and the total project ceiling will be \$460,100.

Conditions at the Site continue to meet the criteria for a removal action under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), as documented in Section 300.415(b)(2) of the National Contingency Plan (NCP). The Site is on the National Priorities List (NPL). There are no nationally significant or precedent-setting issues associated with this removal action.

Extramural Costs:	Current Ceiling	Funds Remaining	Proposed Additional Costs	Proposed Ceiling
<u>Regional Removal Allowance Costs</u>				
Total Cleanup Contractor Cost	\$319,828	\$73,327	\$74,794	\$394,622
<u>Other Extramural Costs Not Funded from the Regional Removal Allowance</u>				
Total RST Costs	<u>\$ 20,481</u>	<u>\$ 10,000</u>	<u>\$15,000</u>	<u>\$ 35,481</u>
Subtotal, Extramural Costs	\$340,309	\$83,327	\$ 89,794	\$430,103
Extramural Costs Contingency	<u>\$ 16,997</u>	<u>16,997</u>	<u>\$ 15,000</u>	<u>\$ 29,997</u>
TOTAL PROJECT CEILING	\$357,306	\$100,324	\$102,794	\$460,100

VII. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

Refer to the August 15, 2001, Action Memorandum included as Attachment A to this document.

VIII. OUTSTANDING POLICY ISSUES

Refer to the August 15, 2001, Action Memorandum included as Attachment A to this document.

IX. ENFORCEMENT

Refer to the August 15, 2001, Action Memorandum included as Attachment A to this document for additional information.

The total EPA costs for this removal action based on full-cost accounting practices that will be eligible for cost recovery are estimated to be \$621,801.

This figure includes Direct Costs which include direct extramural costs and direct intramural costs. Indirect costs are calculated based on an estimated indirect cost rate expressed as a percentage of site-specific direct costs, consistent with the full cost accounting methodology effective October 2, 2000. These estimates do not include pre-judgement interest, do not take into account other enforcement costs, including Department of Justice costs and may be adjusted during the course of a removal action. The estimates are for illustrative purposes only and their use is not intended to create any rights for responsible parties. Neither the lack of a total cost estimate nor deviation of actual total costs from this estimate will affect the United States' right to cost recovery.

Direct Extramural	\$460,100
Direct Intramural	<u>\$ 25,000</u>
Subtotal, Direct Costs	\$485,100
Indirect Costs	<u>\$136,701</u>
(Regional Indirect Cost Rate 28.18% x \$485,100)	

Estimated EPA Costs Eligible for Cost Recovery	\$621,801
--	-----------

X. RECOMMENDATIONS

This decision document represents the selected removal action for the Cornell-Dubilier Electronics Site in South Plainfield, Middlesex County, New Jersey. This document was developed in accordance with CERCLA, as amended, and is not inconsistent with the NCP. This decision is based on the Administrative Record for the Site.

Conditions at the Site continue to meet the NCP Section 300.415(b)(2) criteria and I recommend your approval of the change in scope, ceiling increase of \$102,794, of which \$74,794 is for mitigation contracting, and 12-month exemption. The total removal action ceiling for this action if approved will be \$460,100, of which \$394,622 is for mitigation contracting. There are sufficient monies in the removal advice of allowance to fund this project.

Please indicate your approval and authorization of funding for the Cornell-Dubilier Electronics Site, as per current Delegation of Authority, by signing below.

Approval: George Pavlou Date: 6-28-04
 George Pavlou, Director
 Emergency and Remedial Response Division

Disapproval: _____ Date: _____
 George Pavlou, Director
 Emergency and Remedial Response Division

cc: (after approval is obtained)

G. Pavlou, ERRD-D
 W. McCabe, ERRD-DD
 R. Salkie, ERRD-RAB
 J. Rotola, ERRD-RAB
 G. Zachos, ACSM/O
 R. Dease, ERRD-RAB
 D. Karlen, ORC-NJSUP
 B. Bellow, EPD
 T. Grier, 5202G
 E. Seabrook, OPM-FMB
 D. Johnson, OPM-FMB

P. McKechnie, IG
 C. Moyik, ERRD-PS
 R. Van Fossen, NJDEP
 E. Christman, NOAA
 A. Raddant, DOI
 C. Kelly, RST